

### R E M A R K S

- Claims **15, 18, and 26-34** were pending in the present application
- Claims **15, 18, and 26-34** stand rejected

Upon entry of this amendment, which is respectfully requested for the reasons set forth below:

- Claims **15, 18, and 26-35** will be pending
- Claim **35** will be added
- Claims **15, 18, and 35** will be the only independent claims

### Interview

Applicants would like to thank the Examiner for the helpful Interview held on July 17, 2002 with Applicants' representative. The Examiner and Applicants' representative discussed the present application in light of the Vizcaino and Wong references.

Applicants' representatives stated that the Wong reference does not teach or suggest a feature generally directed to *a second account identifier...for use in place of a first account identifier*, as recited in each of independent Claims **15 and 18**.

Applicants' representatives also stated that there is no motivation to combine the Wong and Vizcaino references.

Applicants are grateful for the Examiner's statement that the claims would be reconsidered in light of the Interview. While no formal agreement was reached, Applicants are grateful for the opportunity to discuss the present application with the Examiner.

### Section 103(a) Rejection

Claims **15, 18, and 26-34** stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,317,636 issued to Vizcaino ("Vizcaino") in view of U.S. Patent No. 5,913,203 issued to Wong ("Wong"). Applicants respectfully traverse the Examiner's Section 103(a) rejection.

**Independent Claims 15 and 18**

Applicants respectfully submit that Vizcaino and Wong, alone or in combination, do not teach or suggest all of the features of any of independent Claims **15 and 18**.

As stated by the Examiner, Vizcaino does not teach or suggest a feature generally directed to “a second account identifier...for use in place of a first account identifier,” as previously recited in each of independent Claims **15 and 18**.

The Examiner, however, asserts: “Wong discloses a second identifier (i.e., pseudo cash unit) in place of a first account identifier (see FIG. 3) to provide anonymity and privacy to a user.” Office Action, page 3. Applicants respectfully traverse this assertion.

Specifically, the “pseudo cash unit” described in Wong does not suggest a feature generally directed to *a second account identifier...for use in place of a first account identifier*, as recited in each of independent Claims **15 and 18**.

1. **“Pseudo cash unit” is not for use in place of a first account identifier**

As discussed with the Examiner during the Interview, the “pseudo cash unit” of Wong does not teach or suggest a second account identifier for use **in place of** a first account identifier.

It is not clear to Applicants what “account” the Examiner is asserting may be identified by the “pseudo cash unit.” FIG. 3 depicts a “first entity account file 17...which includes the identity 18, the user key 8 and the user insertion key 9 of the first entity 1.” Column 8, lines 37-40. Wong, however, is devoid of a hint or suggestion that the “pseudo cash unit” may be used to identify the “first entity account file.”

The “pseudo cash unit” described in Wong may be used to identify a corresponding record in the “pseudo cash repository” that contains a monetary value associated with the “pseudo cash unit.” Column 7, lines 2-7. However, there is no suggestion in Wong that the “pseudo cash unit” is for use in place of another identifier that identifies the “record.” In fact, Wong states that the “record...is uniquely identified with the pseudo cash unit.” Column 7, lines 3-4 (emphasis added). Accordingly, there is no suggestion of another account identifier, much less that the “pseudo cash unit” may be used in place of another account identifier.

As discussed with the Examiner during the Interview, Vizcaino describes a system in which a “verification number” is described as being used in addition to a required account identifier: “More particularly, as shown in FIG. 2A, after operator 102 is required to provide account number 24, operator 102 is then required to provide verification number 44, in order to have the transaction authorized by computer 80.” Column 13, lines 19-28 (emphasis added). “Computer 80 then calls up account file 86 in response to the provision of account number 24, and will thereby have access to all of the data in account 86.” Column 12, lines 41-43 (emphasis added). Thus the required “account number” alone provides access to all of the account data. Accordingly, even if Vizcaino were modified, as proposed by the Examiner, to provide for a “pseudo cash unit” instead of a “verification number,” it is clear that the “pseudo cash unit” would not be **for use in place of** any account identifier, as the “account number” described in Vizcaino is also required.

Thus, neither Vizcaino nor Wong, alone or in combination, teaches or suggests a feature generally directed to *a second account identifier...for use in place of a first account identifier*, as now recited in each of independent Claims **15 and 18**.

2. **No Motivation to Combine Vizcaino and Wong**

As discussed with the Examiner during the Interview, there is no motivation to combine the references, either in the references themselves (alone or in combination), in the knowledge generally available to one having ordinary skill in the art, or in the nature of the problem to be solved.

The Examiner asserts: “[I]t would have been obvious...to modify the apparatus and method of Vizcaino by adopting the teaching of Wong to provide anonymity and privacy to a user.” Office Action, page 3. Applicants respectfully traverse this assertion.

Wong and Vizcaino are not analogous art. Vizcaino is directed to “a method and apparatus by which credit card transactions can be made more secure against fraud and theft.” Column 2, lines 10-12 (emphasis added). In contrast, Wong is directed to providing “a novel cash dispensing system and procedure for use in conducting cash transactions on the Internet such as the purchases of goods, information and services between buyers and sellers.” Column 4, lines 42-46 (emphasis added).

Further, there is no motivation to replace the “verification number” of Vizcaino with the “pseudo cash unit” of Wong, as proposed by the Examiner. Specifically, the Examiner’s proposed modification of Vizcaino system in light of Wong would destroy the principle of operation of the Vizcaino system, which is directed to securing use of a credit card for a transaction. To modify Vizcaino to provide for “pseudo cash units” to conduct a cash-like transaction would completely obviate the use of a credit card for a transaction, thus destroying the principle of operation of Vizcaino.

Also, there is no motivation to provide anonymity to the Vizcaino system by providing for “pseudo cash units” instead of a “verification number,” where transmission of the account number is required, as discussed above.

#### **Claim 27**

Applicants again respectfully request that the Examiner clarify the statement that “Vizcaino discloses that the processing unit (82) is associated with a merchant (a station at a retail store).” As Applicants understand FIG. 4, the “processing unit 82” is described as being included in “computer 80,” not a “merchant” or “station 104.” Accordingly, Applicants respectfully submit that the “processing unit 82” does not teach or suggest a feature of *wherein the processing unit is associated with a merchant*, as recited in Claim 27.

Applicants respectfully submit that Wong does not suggest such a feature; the Examiner does not assert otherwise.

#### **Claim 34**

For at least the reasons stated above with respect to independent Claims 15 and 18, Applicants again respectfully submit that the “verification number” described in Vizcaino does not teach or suggest an identifier, much less an account identifier, much less a feature *wherein the second account identifier comprises a sixteen-digit identifier*, as recited in Claim 34. Accordingly, Applicants respectfully traverse the Examiner’s assertion that a sixteen-digit account identifier is “a matter of obvious design choice.”

Applicants respectfully submit that Wong does not suggest such a feature; the Examiner does not assert otherwise.

### New Claims 35 Is Allowable

Applicants respectfully submit that new independent Claim 35 contains allowable subject matter. As discussed above, neither Vizcaino nor Wong, alone or in combination, teaches or suggests a feature generally directed to a second account identifier for use in place of a first account identifier. Applicants respectfully submit that the references also do not suggest a feature generally directed to:

- *receiving a credit card number from a customer as payment for the transaction,*
  - *in which the credit card number is for use only one time, and*
  - *in which the credit card number is for use in place of an account number that identifies a credit card account*

as recited in new independent Claim 35.

Accordingly, Applicants respectfully submit that new independent Claim 35 contains allowable subject matter.

### Conclusion

It is submitted that all of the claims are in condition for allowance. The Examiner's early re-examination and reconsideration are respectfully requested.

Please charge any fees that may be required for this Amendment to Deposit Account No. 50-0271. Furthermore, should an extension of time be required, please grant any extension of time which may be required to make this Amendment timely, and please charge any fee for such an extension to Deposit Account No. 50-0271.

If the Examiner has any questions regarding this amendment or the present application, the Examiner is cordially requested to contact Michael Downs at telephone number (203) 461-7292 or via electronic mail at [mtdowns@walkerdigital.com](mailto:mtdowns@walkerdigital.com).

Respectfully submitted,

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Date

  
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